

***APPENDIX C***

***LIST OF E&P WASTES:  
EXEMPT AND NONEXEMPT***

**NOTES**

## LIST OF E&P WASTES: EXEMPT AND NON EXEMPT

The lists below are not complete lists of exempt wastes and non exempt wastes. Additional wastes may be discovered during your day-to-day E&P operations. It is important to remember that a material that is unique to E&P operations must be used in primary field operations to gain exemption as a waste. Chapter 3 of this manual and the references cited in Chapter 3 can provide guidance in determining the waste's regulatory status. Please note, however, the Commission or the EPA should be contacted for guidance in the event the regulatory status of a waste is in doubt.

### EXEMPT WASTES

Activated charcoal filter media	Gas plant sweetening wastes for sulfur removal:
Basic sediment and water (BS&W) - see Tank bottoms	a. Amines (including amine reclaimer bottoms)
Caustics, if used as drilling fluid additives or for gas treatment	b. Amine filters (see process filters), amine filter media and backwash
Condensate	c. Amine sludge, precipitated
Cooling tower blowdown	d. Iron sponge (and iron sulfide scale)
Debris, crude oil soaked	e. Hydrogen sulfide scrubber liquid and sludge
Debris, crude oil stained	Gases removed from the production stream (i.e., H <sub>2</sub> S, CO <sub>2</sub> , and VOCs)
Deposits removed from piping and equipment prior to transportation (i.e., pipe scale, hydrocarbon solids, hydrates, and other deposits)	Liquid hydrocarbons removed from the production stream but not from oil refining
Drilling cuttings/solids	Liquid and solid wastes generated by crude oil and tank bottom reclaimers
Drilling fluids	Oil, weathered
Drilling fluids and cuttings from offshore operations disposed of onshore	Paraffin
Gas dehydration wastes:	Pigging wastes from producer operated gathering lines
a. Glycol-based compounds	Pit sludges and contaminated bottoms from storage or disposal of exempt wastes
b. Glycol filters (see process filters), filter media, and backwash	Process filters
c. Molecular sieves	

**EXEMPT WASTES (Continued)**

Produced sand	Tank bottoms and basic sediment and water (BS&W) from: storage facilities that hold product and exempt waste (including accumulated materials such as hydrocarbons, solids, sand, and emulsion from production separators, fluid treating vessels, and production impoundments).
Produced water	
Produced water constituents removed before disposal (injection or other disposal)	
Produced water filters (see Process filters)	VOCs from exempt wastes in reserve pits or impoundments or production equipment
Rigwash	
Slop oil (waste crude oil from primary field operations and production)	Well completion, treatment, and stimulation, and packing fluids
Soils, crude oil-contaminated	Workover wastes (i.e., blowdown, swabbing and bailing wastes)
Sulfacheck/Chemsweet waste	

**NONEXEMPT WASTES**

*Although the wastes listed below are not exempt from RCRA Subtitle C, they are not necessarily hazardous or necessarily subject to hazardous waste regulation. Use process knowledge or testing to determine the waste characteristics prior to management.*

Batteries: lead acid	Methanol, unused
Batteries: nickel-cadmium	Oil, equipment lubricating (used)
Boiler cleaning wastes	Paint and paint wastes
Boiler refractory bricks	Pesticide and herbicide wastes
Caustic or acid cleaners	Pipe dope, unused
Chemicals, surplus	Radioactive tracer wastes
Chemicals, unusable (including waste acids)	Refinery wastes (e.g., unused frac fluids or acids)
Compressor oil, filters, and blowdown waste	Sandblast media
Debris, lube oil contaminated	Scrap metal
Drilling fluids, unused	Soil, chemical-contaminated (including spilled chemicals)
Drums/containers, containing chemicals	Soil, lube oil-contaminated
Drums/containers, containing lubricating oil	Soil, mercury-contaminated
Drums, empty (and drum rinsate)	Solvents, spent (including waste solvents)
Filters, lubrication oil (used)	Thread protectors, pipe dope-contaminated
Gas plant cooling tower cleaning wastes	Vacuum truck rinsate (from tanks containing nonexempt waste)
Hydraulic fluids, used	Waste in transportation pipeline related pits
Incinerator ash	Well completion, treatment and stimulation fluids, unused
Laboratory wastes	
Mercury	

## **QUESTIONABLE STATUS WASTES**

*These wastes were not specifically listed by EPA as exempt; however, they do appear to be exempt based on the Regulatory Determination<sup>6</sup> and Clarification<sup>7</sup> provided by EPA.*

Cement slurry returns from the well and cement cuttings (unused cement slurries would be nonexempt)

Gas plant sweetening unit catalyst

Natural gas gathering line hydrotest water

Produced-water-contaminated soil

Sulfur recovery unit wastes

## **SPECIAL CATEGORY WASTES**

*Special category wastes are subject to waste specific regulations.*

Naturally occurring radioactive materials (NORM):

The possession, use, transfer, transport, and/or storage of NORM or the recycling of certain NORM-contaminated materials is regulated by the Texas Department of Health (TDH). Disposal of oil and gas NORM waste and operations incidental to disposal are regulated by the Railroad Commission. Disposal of all other NORM is regulated by the TNRCC.

Polychlorinated biphenols (PCBs) and PCB-contaminated soils:

Regulated under the federal Toxic Substances Control Act (TSCA). At the state level, oil and gas wastes contaminated by PCBs are regulated by the Railroad Commission.

Asbestos:

Regulated under the National Emissions Standards for Hazardous Air Pollutants (NESHAP). At the state level, asbestos waste from oil and gas operations is regulated by the Railroad Commission of Texas (regarding oil and gas waste), the Texas Department of Health (regarding NESHAPS), and the Texas Natural Resource Conservation Commission (regarding disposal in landfills).